

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Angela M. Velasquez	:	
<u>Debtor</u>	:	
	:	CHAPTER 13
MidFirst Bank	:	
<u>Movant</u>	:	Case No. 15-11644 (JKF)
	:	
v.	:	Hearing Date: 09-21-2016 at 9:30 am
	:	
Angela M. Velasquez	:	11 U.S.C. 362
<u>Respondent</u>	:	
	:	
William C. Miller, Esq.	:	
<u>Trustee</u>	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

And now Angela M. Velasquez, by her attorney, Stephen Dunne, Esquire answers the request for relief from the automatic stay and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied.
7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE, debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire
/s/ Stephen M. Dunne
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